

AB:JBD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

GUIWEI SHAN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

STEVEN HE, being duly sworn, deposes and states that he is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

On or about June 22, 2023, within the Eastern District of New York and elsewhere, the defendant GUIWEI SHAN did knowingly and unlawfully possess a counterfeit key suited to any lock adopted by the Postal Service for any authorized receptacle for the deposit or delivery of mail matter with the unlawful and improper intent to use the same.

(Title 18, United States Code, Section 1704)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been involved in the investigation of numerous cases involving postal theft.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

TO BE FILED UNDER SEAL

AFFIDAVIT & COMPLAINT
IN SUPPORT OF AN
ARREST WARRANT

(18 U.S.C. § 1704)

23-MJ-597-XXX 599

I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about June 22, 2023, the defendant GUIWEI SHAN was stopped by the New York City Police Department ("NYPD") for driving a vehicle without a license plate. NYPD officers asked SHAN for his driver's license, at which point SHAN gave NYPD officers a New York driver's license featuring a picture of an individual who was not SHAN. When NYPD officers looked inside SHAN's vehicle, they saw what appeared to be a pipe used to smoke crack cocaine in the driver's side door. SHAN was then placed under arrest.

3. During a search incident to arrest, NYPD officers discovered three arrow keys in the pockets of the defendant GUIWEI SHAN's sweater. During a subsequent search of SHAN's car, NYPD officers found 12 more arrow keys and tools that appeared to be designed to alter arrow keys, including screw drivers and filing equipment. A picture of the 15 arrow keys the NYPD seized from SHAN's person and vehicle is below.



4. After being arrested, the defendant GUIWEI SHAN was read his Miranda warnings in Mandarin, his native language. After being read his Miranda warnings, SHAN agreed to speak with NYPD officers and USPIS through an interpreter. During that interview, SHAN admitted, in sum, substance and in part, to making counterfeit arrow keys and to stealing mail. SHAN also acknowledged that the vehicle he was driving, which contained 12 arrow keys found by the NYPD, belonged to him.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued so that the defendant GUIWEI SHAN may be dealt with according to law. In addition, I respectfully request that this complaint and the requested arrest warrant remain under seal until the defendant is arrested in order to prevent the defendant's flight.

/s/ Steven He

STEVEN HE
Postal Inspector,
United States Postal Inspection Service

Sworn to before me telephonically this
23 day of June, 2023

Cheryl L. Pollak

THE HONORABLE CHERYL L. POLLAK
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK